



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

September 28, 2016

**VIA ECF**

The Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: United States v. Vincent Ghahremani  
15 Crim. 793 (JMF)

Dear Judge Furman:

The Government respectfully submits the enclosed proposed protective order concerning the discovery materials it intends to produce to defendant Vincent Ghahremani. Counsel for the defendant has no objection to the proposed order.

Respectfully submitted,

PREET BHARARA  
United States Attorney

By: /s/ Shawn G. Crowley  
Shawn G. Crowley  
Assistant United States Attorney  
(212) 637-1034

cc: Robert Feitel, Esq. (via ECF)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA      :
:                               : PROTECTIVE ORDER
- v. -                        :
:                               : 15 Cr. 793 (JMF)
VINCENT GHAHREMANI,          :
:                               :
Defendant.                   :
:                               :
- - - - - X
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HONORABLE JESSE M. FURMAN, District Judge:

WHEREAS, VINCENT GHAHREMANI, the defendant, has sought from the Government access to certain recordings and electronic communications that are discoverable pursuant to Rule 16 of the Federal Rules of Criminal Procedure ("Rule 16") and which were recorded by a confidential source or sources;

WHEREAS, the Government intends to produce to the defendant these recordings and electronic communications (the "protected recordings") and accompanying draft summaries, draft transcripts, and reports concerning the meetings or communications reflected in the protected recordings, to the extent available (collectively, the "protected materials");

WHEREAS, the Government desires to protect the identity of the confidential source(s) who made the recordings and electronic communications contained in the protected materials and to protect the integrity of on-going

investigations;

NOW, THEREFORE, IT IS HEREBY ORDERED:

1. The protected materials shall be used by the defendant, his counsel, and his counsel's agents only for purposes of defending the charges, in connection with sentencing, and pursuing any appeals, in this criminal action. To the extent the protected materials are shown to additional persons consistent with the terms set forth below, those additional persons may only use the protected materials in connection with this criminal action.

2. The Government will mark all items subject to this protective order in a manner indicating their protected status.

3. The protected materials and the information and identities contained or disclosed therein:

(a) Shall be used by the defendant and his counsel only for purposes of this action;

(b) Shall not be disclosed in any form by the defendant or his counsel except as set forth in paragraph 3(c) below;

(c) May be disclosed only by the defendant's counsel and only to the following persons (hereinafter "Designated Persons"):

- (i) investigative, secretarial, clerical, paralegal and student personnel employed full-time or part-time by the defendant's attorneys;
- (ii) independent expert witnesses, investigators or advisors consulted with, or retained by the defendant in connection with this action; and
- (iii) upon a motion by the defendant pursuant to paragraph 5 below, to show and upon an appropriate showing of necessity provide copies of protected materials to such other persons as hereafter may be authorized by the Court; and

(d) Shall be returned to the Government following the conclusion of this case.

4. The defendant and his counsel shall provide a copy of this protective order to Designated Persons to whom the protected materials are disclosed pursuant to paragraphs 3(c)(i), (ii) and (iii). Designated Persons shall be subject to the terms of this order.

5. Defense counsel may seek authorization of the Court -- including on an ex parte basis, where appropriate -- to

show and when necessary provide certain specified discovery materials to persons whose access to discovery materials is otherwise prohibited by the preceding paragraphs, if it is determined by the Court that such access is necessary for the purpose of preparing the defense of the case.

6. The provisions of this order shall not be construed as preventing the disclosure of any information in any motion, hearing, trial, sentencing, or appeal proceeding held in this action or to any judge or magistrate of this Court for purposes of this action.

SO ORDERED:

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HONORABLE JESSE M. FURMAN  
United States District Judge  
Southern District of New York

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Date